

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

FILED UNDER SEAL

UNITED STATES OF AMERICA,)
)
 v.) CRIMINAL NO. 13-10200-GAO
)
 DZHOKHAR TSARNAEV)

**SEALED MOTION TO SEAL MOTION TO ADMIT TESTIMONY
BY SISTER HELEAN PREJEAN**

Defendant moves that the Court grant him leave to file the instant Motion and the attached *Motion to Admit Testimony of Sister Helen Prejean*. As ground for this motion, the defendant states that the sealing is necessary because the subject matter of the motion concerns proffered testimony and exhibits that are not in the public record. .

Respectfully submitted,
DZHOKHAR TSARNAEV

By his attorneys

/s/ *Miriam Conrad*

David I. Bruck, Esq. (SC Bar # 967)
220 Sydney Lewis Hall
Lexington, VA 24450
(540) 460-8188
BRUCKD@WLU.EDU
Judy Clarke, Esq. (CA Bar # 76071)
CLARKE & RICE, APC
1010 Second Avenue, Suite 1800
San Diego, CA 92101
(619) 308-8484
JUDYCLARKE@JCSRLAW.NET

Miriam Conrad, Esq. (BBO # 550223)
Timothy Watkins, Esq. (BBO # 567992)
William Fick, Esq. (BBO # 650562)
FEDERAL PUBLIC DEFENDER OFFICE
51 Sleeper Street, 5th Floor
(617) 223-8061
MIRIAM_CONRAD@FD.ORG
TIMOTHY_WATKINS@FD.ORG
WILLIAM_FICK@FD.ORG

CERTIFICATE OF SERVICE

I hereby certify that copies of this document filed under seal have been served on Assistant U.S. Attorneys William Weinreb, Aloke Chakravarty, Steven Mellin, and Nadine Pellegrini by email on May 8, 2015.

/s/ Miriam Conrad